REMARKS

Claims 1-17 are currently pending in the subject application and are presently under consideration. A current listing of the claims is shown at pp. 2-4 of the Reply.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I.   **Rejection of Claim 1 Under 35 U.S.C. §102(b)**

Claim 1 stands rejected under 35 U.S.C. §102(b) as being anticipated by Molina. Withdrawal of this rejection is requested for at least the following reasons. Molina is not citable art under this section. In order for a patent or publication to be cited as prior art under this section, it must qualify as prior art under one of 35 U.S.C. §102(a), (b), or (e). *Molina was published after applicants' filing date and does not qualify as prior art under sections 35 U.S.C. §102 (b).* In the Final Office Action (dated June 21, 2007), the Examiner argues that "Molina directly cites and summarizes publications that qualify as 35 U.S.C. §102(b)". Applicants' representative respectfully disagrees as this is an improper rejection. The MPEP clearly states that under 35 U.S.C. §102(a) "a person shall be entitle to a patent unless – (b) the invention was patented or described in a printed publication in this or a foreign country or in public use or on sale in this country, *more than one year prior to the date of the application* for patent in the United States". Furthermore, the MPEP 2128 states that "if an electronic document which is the abstract of a patent or printed publication is relied upon in a rejection under 35 U.S.C. 102 or 103, only the text of the abstract (and not the underlying document) may be relied upon to support the rejection." It is therefore readily apparent that Molina does not qualify as prior art and that this is an improper rejection.

Moreover, assuming *arguendo* that Molina could be used to reject these claims, Molina fails disclose or suggest each and every limitation of applicants' claimed subject matter.

> A single prior art reference anticipates a patent claim only if it expressly or inherently describes *each and every* limitation set forth in the patent claim. *Trintec Industries, Inc. v. Top-U.S.A. Corp.,* 295 F.3d 1292, 63 USPQ2d 1597 (Fed. Cir. 2002); *See Verdegaal Bros. v. Union Oil Co. of California,* 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the …

claim. *Richardson v. Suzuki Motor Co.,* 868 F.2d 1226, 9 USPQ2d
1913, 1920 (Fed. Cir. 1989).

Applicants' claimed subject matter relates generally to analyzing features of one or more
documents, and representing such document(s) with unique domain models to facilitate locating,
indexing, and categorizing, for example, such document(s). In particular, independent claim 1
recites *a computer-implemented method to process a document, comprising: analyzing features of
a document; and generating a set of domain models, as a function of the analyzed features, that
represent the document.* Molina fails to disclose or suggest each and every element of the
claimed subject matter.

Molina merely teaches the use of knowledge modeling tools in the design and
development of knowledge based decision support system. To this end, Molina discloses a
decision support system (SAIDA), designed and developed with the help of KSM tools to help
operate hydrologic control centers. Molina specifically teaches that the decision support system
(SAIDA) is implemented using a *task-method-domain* architecture. It should be noted that task
ontologies describe the reasoning concepts and their relationships occurring within a certain
domain for a specific task. On the other hand, the claimed subject matter provides for generating
one or more unique models to represent a single document, and for example employing such
models in connection with taking action related to the document. For example, the Specification
clearly teaches that the claimed invention provides for the creation of a collection of models based
on different knowledge sources. (*See,* Specification page 7, lines 16-18). Molina fails to teach or
suggest any such process.

In the Final Office Action (dated June 21, 2007), the Examiner argues that "Molina
expressly shows (see pp.3-4)" that "generating a set of domain models" was previously taught by
"Chandrasekaran '83 and '86, Wielinga et al. '92, and Steels '90". Applicants' representative
respectfully disagrees. At the indicated passages Molina merely teaches that simple tasks can be
performed using declarative knowledge and that this requires an ontological definition of such a
declarative knowledge that is viewed as a set of domain models in the form of types of knowledge
bases that support primary tasks. Molina discloses that this type of description based on tasks and
methods was originally present in several proposals from different authors such as the *generic
task* (Chandrasekaran 83, 86), the KADS model (Wielinga *et al.* 92), the model of components of

expertise (Steels 90), the role limiting method (McDermott 88). However, there is no notion of analyzing a document for features, and generating a set of unique domain models, as a function of the analyzed features, that represent the document, as recited in the claimed subject matter. It is readily apparent Molina fails to disclose or suggest applicants' invention as recited in independent claim 1, and the claims that depend there from.

In view of at least the foregoing, it is respectfully submitted that Molina neither anticipates nor makes obvious applicants' claimed invention, and this rejection should be withdrawn.

II.   Rejection of Claims 1-17 Under 35 U.S.C. §103(a)

Claims 1-17 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Chandrasekaran in view of Knight and further in view of Debnath. Applicants' representative respectfully requests that this rejection be withdrawn for at least the following reasons. Chandrasekaran, Knight and Debnath, taken alone or in combination, fail to disclose, teach or suggest all elements recited in the subject claims.

> To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second there must be a reasonable expectation of success. Finally, **the prior art reference (or references when combined)** *must teach or suggest all the claim limitations*. *See* MPEP §706.02(j). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must be found in the prior art and not based on the applicant's disclosure. *See In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). (emphasis added).

Independent claim 1 recites *a computer-implemented method to process a document, comprising: analyzing features of a document; and generating a set of domain models, as a function of the analyzed features, that represent the document.* As mentioned *supra*, Chandrasekaran fails to teach or suggest each and every element of the claimed subject matter. Chandrasekaran relates to a conceptual introduction to ontologies and their role in information

systems and artificial intelligence (AI). Chandrasekaran generally talks about the different roles played by ontologies in information systems, natural language understanding, and knowledge based systems. However, Chandrasekaran is completely silent about *analyzing features of a document; and generating a set of domain models, as a function of the analyzed features, that represent the document,* as recited in independent claim 1.

In the Final Office Action (dated June 21, 2007), the Examiner contends that Chandrasekaran fails to teach or suggest " representing a document" and offers Knight to cure this deficiency of Chandrasekaran. Contrary to the Examiner assertions Knight fails to disclose or suggest analyzing a document for features, and generating a set of unique domain models, as a function of the analyzed features, that represent the document. Knight merely relates to building a large-scale knowledge base for machine translation (KBMT). Knight discloses construction of a large ontology for supporting KBMT. Knight further discloses that the ontology is constructed by merging various online dictionaries, semantic networks, and bilingual resources. However Knight is completely silent about creating one or more unique models for a particular document in connection with representing the same document. For example, the Specification clearly teaches a process that allows for the creation of a collection of models based on different knowledge sources as opposed to the traditional use of ontologies, which consists of taking a knowledge base and creating a single collective view or representation. Knight uses such a traditional approach to build an ontology for supporting a KBMT and fails to disclose or suggest the creation of a collection of models based on different knowledge sources. More particularly, Knight fails to disclose or suggest *analyzing features of a document; and generating a set of domain models, as a function of the analyzed features, that represent the document,* as recited in independent claim 1.

In addition, the Examiner offers Debnath to cure the deficiencies of Chandrasekaran and Knight with respect to "analyzing" features of a document. Applicants' representative respectfully disagrees. Firstly, Debnath does not make for the aforementioned deficiencies of Chandrasekaran and Knight. Secondly, the Examiner incorrectly interprets "building relations between words and phrases" as "analyzing features of a document" of the claimed subject matter. Debnath merely teaches the use of ontology to build relations between words and phrases to facilitate searching a database. Debnath fails to disclose or suggest ***analyzing features of a document; and generating a set of domain models,*** *as a function of the analyzed*

features, that represent the document. For at least the above reasons, the rejection of independent claim 1 (and claims that depend there from) should be withdrawn.

Independent claim 9 recites a computer-implemented method to facilitate locating a document, comprising: ***receiving a query related to locating the document; and searching across a plurality of domain models that respectively represent a plurality of documents; and identifying a set of the domain models that match criteria of the receive query.*** Chandrasekaran and Knight, taken alone or in combination, fails to disclose or suggest a method for searching for documents let alone searching across domain models that represent respective documents as in applicant's claimed invention. Furthermore, Debnath does not make up for the deficiencies of Chandrasekaran and Knight. In particular, Debnath fails to disclose or suggest ***searching across a plurality of domain models that respectively represent a plurality of documents,*** as recited in independent claim 9. For at least the above reasons, the rejection of independent claim 9 should be withdrawn.

Independent claims 10 and 11 recite similar features relating to representing document(s) via unique domain models, and as mentioned *supra* Chandrasekaran, Knight and Debnath, taken alone or in combination, fail to disclose or suggest such aspects of the claimed invention. For at least the above reasons, the rejection of independent claims 10 and 11 (and claims that depend there from) should be withdrawn.

CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [MSFTP1836USA].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

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